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8 Attorneys for Defendant

9 ENTERPRISE TRUST COMPANY

10 UNITED STATES DISTRICT COURT  
11  
12 NORTHERN DISTRICT OF CALIFORNIA  
13 OAKLAND DIVISION

14 RUTHE P. GOMEZ,

15 Plaintiff,

16 vs.

17 TRADERIGHT CORP. d/b/a TRADERIGHT  
SECURITIES, INC., ENTERPRISE TRUST  
18 COMPANY, and LOCKE HAVEN, LLC,

19 Defendants.

) Case No. CV 08-0266 (WDB)

) **STIPULATION AND [PROPOSED] ORDER**  
) **EXTENDING TIME TO FILE RESPONSE**  
) **TO COMPLAINT**

1 Pursuant to Local Rule 6-2, Plaintiff Ruthe P. Gomez, on the one hand, and Defendants  
2 Enterprise Trust Company ("Enterprise Trust") and TradeRight Corporation ("TradeRight"), on the  
3 other hand, by and through their respective counsel of record, hereby stipulate and agree as follows:

4 WHEREAS, Ms. Gomez initiated this action in the Superior Court of the State of California in  
5 the County of Alameda (Case No. RG 07362098) on or about December 19, 2007;

6 WHEREAS, Enterprise Trust removed this action to this Court on or about January 15, 2008;

7 WHEREAS, on January 16, 2008, TradeRight filed its joinder in Enterprise Trust's removal of  
8 this action to this Court;

9 WHEREAS, Ms. Gomez seeks, by this action, to transfer her trust accounts from Enterprise  
10 Trust to A.G. Edwards & Sons or other custodians;

11 WHEREAS, the parties have been cooperating and working diligently to complete the transfer  
12 of Ms. Gomez's accounts, and expect to complete that process within the next three to four weeks;

13 WHEREAS, on January 23, 2008, the parties filed a Stipulation to extend time for Enterprise  
14 Trust and TradeRight to respond to the Complaint by approximately 10 days, until Friday, February  
15 15, and this Court approved that Stipulation on January 25, 2008 (Docket 7);

16 WHEREAS, the Initial Case Management Conference in this action has been set for April 23,  
17 2008;

18 WHEREAS, no discovery has yet occurred;

19 WHEREAS, other than the one 10-day extension referenced above, no other time modifications  
20 have been made in this action, whether by stipulation or by Court order;

21 WHEREAS, this stipulated time modification will not have any effect on the schedule for this  
22 action;

23  
24 NOW THEREFORE, IT IS HEREBY STIPULATED, by and between the undersigned, that

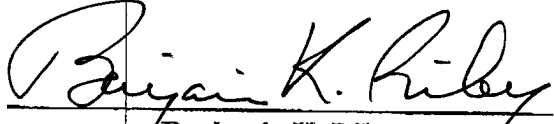
25 1. The time for Enterprise Trust and TradeRight to file a pleading responsive to the  
26 Complaint is extended up to and including March 14, 2008.

1 Dated: February 11, 2008

Respectfully submitted,

HOWREY LLP

By:

  
Benjamin K. Riley

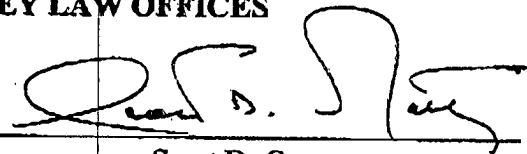
Attorneys for Defendant  
ENTERPRISE TRUST COMPANY

8 Dated: February 11, 2008

Respectfully submitted,

GATTEY LAW OFFICES

By:

  
Scott D. Gattey


Attorneys for Defendant  
TRADERIGHT CORP., d/b/a  
TRADERIGHT SECURITIES, INC.

16 Dated: February 11, 2008

Respectfully submitted,

BALDWIN LAW GROUP

By:

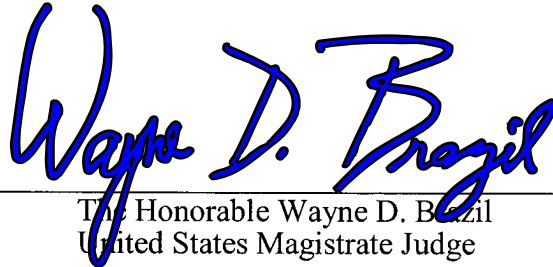
  
Patrick Baldwin

Attorneys for Plaintiff  
RUTHE P. GOMEZ

1 [PROPOSED] ORDER  
2

3 PURSUANT TO STIPULATION, IT IS ORDERED that the time for Enterprise Trust and  
4 TradeRight to file a pleading responsive to the Complaint is extended up to and including March 14,  
5 2008.

6  
7  
8 Dated: February <sup>12</sup>\_, 2008

9   
The Honorable Wayne D. Bevil  
United States Magistrate Judge

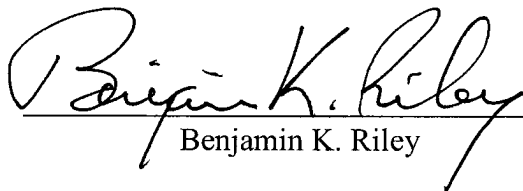
**FILER'S ATTESTATION**

Pursuant to General Order No. 45, Section X, Subparagraph B, of the United States District Court for the Northern District of California, the undersigned attests that all parties have concurred in the electronic filing of this Stipulation and [Proposed] Order.

Dated: February 11, 2008

Respectfully submitted,

**HOWREY LLP**

By:   
Benjamin K. Riley

Attorneys for Defendant  
ENTERPRISE TRUST COMPANY